

# Common Sense Initiative

Mike DeWine, Governor Jon Husted, Lt. Governor

Joseph Baker, Director

#### **Business Impact Analysis**

| Agency, Board, or Commission Name:   | Board of Building Standards                                  |
|--|--|
| Rule Contact Name and Contact Information:   |  |
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| Regulation/Package Title (a general description  | on of the rules' substantive content):                       |
| Ohio Plumbing Code Update  |  |
| Rule Number(s): <u>Rescind all existing rules in 4101:3-2-01, 4101:3-3-01, 4101:3-4-01, 4101:3-4-01, 4101:3-11-01, 4104-11-01, 4</u> | 3-5-01, 4101:3-6-01, 4101:3-7-01, 4101: <mark>3-8-01,</mark> |
| Date of Submission for CSI Review:4  Public Comment Period End Date:5/   |  |
| Rule Type/Number of Rules:   | 10,20  |
| New/_15_rules  | No Change/ rules (FYR?)                                      |
| Amended/ rules (FYR?)  | Rescinded/ <u>15</u> rules (FYR? <u>X</u> )                  |

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing

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regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

#### **Reason for Submission**

1. R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.

Which adverse impact(s) to businesses has the agency determined the rule(s) create?

The rule(s):

| a. | ⊠<br>oper | Requires a license, permit, or any other prior authorization to engage in or ate a line of business.                             |
|----|-----------|--|
| b. |           | Imposes a criminal penalty, a civil penalty, or another sanction, or creates a e of action for failure to comply with its terms. |

| c. |     | Requires specific expenditures or the report of information as a condition of |
|----|-----|---|
|    | com | pliance.  |

d. 

Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.

#### **Regulatory Intent**

2. Please briefly describe the draft regulation in plain language.

Please include the key provisions of the regulation as well as any proposed amendments.

The Ohio Board of Building Standards (Board) proposes to rescind all existing rules in 4101:3 and adopt new Ohio Administrative Code (OAC) rules to incorporate the 2021 International Plumbing Code by refence with Ohio amendments as follows:

**4101:3-1-01** This proposed rule regulates the administration of the plumbing code by certified building departments and local health departments.

**4101:3-2-01** This proposed rule sets forth the definitions of terms used in rules 4101:3-1-01 through 4101:3-15-01

**4101:3-3-01** This proposed rule contains the general requirements for the installation of plumbing systems for toilet rooms.

**4101:3-4-01** This proposed rule regulates number and installation of plumbing fixtures.

**4101:3-5-01** This proposed rule regulates design and installation of water heaters.

**4101:3-6-01** This proposed rule sets forth the requirements for water supply systems within a building.

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**4101:3-7-01** This proposed rule regulates the design and installation of sanitary drainage piping systems within a building.

**4101:3-8-01** This proposed rule regulates drainage installations requiring an indirect connection to the sanitary drainage.

**4101:3-9-01** This proposed rule contains requirements for vents and venting of plumbing systems.

**4101:3-10-01** This proposed rule regulates installation of plumbing system traps, interceptors and separators.

**4101:3-11-01** This proposed rule sets forth the requirements for storm drainage.

**4101:3-12-01** This proposed rule regulates the design and installation of special piping and storage systems including medical gas.

**4101:3-13-01** This proposed rule references the nonpotable water systems requirements regulated by the Ohio Department of Health.

**4101:3-14-01** This proposed rule references the subsurface landscape irrigation system requirements regulated by the Ohio Department of Health.

**4101:3-15-01** This proposed rule lists technical standards referenced in rules 4101:3-1 through 4101:3-14

Significant changes to these rules are listed in attached Exhibit A.

3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.

Revised Code § 3781.10: <a href="http://codes.ohio.gov/orc/3781.10">http://codes.ohio.gov/orc/3781.10</a>
Revised Code § 3781.11: <a href="http://codes.ohio.gov/orc/3781.11">http://codes.ohio.gov/orc/3781.11</a>
Revised Code § 3791.04: <a href="http://codes.ohio.gov/orc/3791.04v1">http://codes.ohio.gov/orc/3791.04v1</a>

4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program? If yes, please briefly explain the source and substance of the federal requirement.

No – See Ohio Building Code Update BIA

5. If the regulation implements a federal requirement, but includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

Not applicable

6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

Revised Code § 3781.10 directs the Board to "formulate and adopt rules governing the erection, construction, repair, alteration and maintenance of all buildings specified in section 3781.06 of the Revised Code..." Additionally, Revised Code 3781.06 provides:

Any building that may be used as a place of resort, assembly, education, entertainment, lodging, dwelling, trade, manufacture, repair, storage, traffic, or occupancy by the public, any residential building, and all other buildings or parts and appurtenances of those buildings erected within this state, shall be so constructed, erected, equipped, and maintained that they shall be safe and sanitary for their intended use and occupancy.

This statute defines safe and sanitary as follows:

"Safe," with respect to a building, means it is free from danger or hazard to the life, safety, health, or welfare of persons occupying or frequenting it, or of the public and from danger of settlement, movement, disintegration, or collapse, whether such danger arises from the methods or materials of its construction or from equipment installed therein, for the purpose of lighting, heating, the transmission or utilization of electric current, or from its location or otherwise.

"Sanitary," with respect to a building, means it is free from danger or hazard to the health of persons occupying or frequenting it or to that of the public, if such danger arises from the method or materials of its construction or from any equipment installed therein, for the purpose of lighting, heating, ventilating, or plumbing.

The Ohio Building Code (OBC) sets forth the construction standards for nonresidential buildings in the State of Ohio to ensure that they are safe and sanitary. Additionally, Revised Code § 3781.01 provides that local governments may not adopt regulations that that conflict with the Board's rules to facilitate the uniform application of the standards.

Revised Code 3781.11 lists conditions that rules of the Board must address, including:

(1) For nonresidential buildings, provide uniform minimum standards and requirements, and for residential buildings, provide standards and requirements that are uniform throughout the state, for construction and construction materials, including construction of industrialized units, to make residential and nonresidential buildings safe and sanitary as defined in section 3781.06 of the Revised Code;

- (2) Formulate such standards and requirements, so far as may be practicable, in terms of performance objectives, so as to make adequate performance for the use intended the test of acceptability;
- (3) Permit, to the fullest extent feasible, the use of materials and technical methods, devices, and improvements, including the use of industrialized units which tend to reduce the cost of construction and erection without affecting minimum requirements for the health, safety, and security of the occupants or users of buildings or industrialized units and without preferential treatment of types or classes of materials or products or methods of construction;
- (4) Encourage, so far as may be practicable, the standardization of construction practices, methods, equipment, material, and techniques, including methods employed to produce industrialized units;

#### 7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

The enforcement of these rules will be implemented by certified township, city, and county building departments. Rule 4101:1-1-01 lays out the administrative procedures certified building departments must follow to implement the substantive requirements of these rules to determine compliance. These provisions require a builder or owner to make application to a building department to obtain an approval to build (permit). As part of this application the owner must submit sufficient information and/or construction documents for the building official/plans examiner to determine whether the proposed work complies with the code. After the builder or owner obtains the approval (permit), construction may commence and the building department inspectors will inspect the construction to ensure that the work conforms with the original approval. Rule 4101:1-1-01 § 105.3 provides that in the absence of fraud or a serious safety or sanitation hazard, any non-residential structure built in accordance with approved plans shall be conclusively presumed to comply with these rules. The Board requires that certified nonresidential building departments submit an annual yearly operational report which lists the following information: current employees and their certifications, total number of permits issued during the year for each type of occupancy, total number of inspections made, the total value of construction, and the total number of appeals of the code requested by a builder or owner during the year.

8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?

If yes, please specify the rule number(s), the specific R.C. section requiring this submission, and a detailed explanation.

Not applicable.

**Development of the Regulation** 

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### 9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

The Board maintains a stakeholder distribution including building department personnel, contractors, designers and professional associations. The stakeholder list is available upon request.

On March 2, 2023, the Board sent an email to all agency stakeholders informing them of a scheduled stakeholder meeting on March 22, 2023 to hear comments and respond to questions on these rules. The notice summarized the proposed rules and provided other information, background and resources for stakeholder review and also informed stakeholders that if they could not attend the stakeholder meeting, they could submit questions or comments via email: <a href="Proposed 2024 Ohio Building">Proposed 2024 Ohio Building</a>, <a href="Mechanical & Plumbing Code Rules | Ohio Department of Commerce">On March 22</a>, 2023, the Board conducted a stakeholder meeting on the proposed rules at 1:00 PM and the following individuals attended: In-Person:Chris Randles, Summit County, David Molnar, OBOA/Richland County, Charles Huber, City of Lakewood, Ron Bartley, Nicholas Montan, Tuscarawas County, Lisa Reiheld, ICC, Tracie Boyd, SFM, Kim Boulter, Changing Spaces Ohio, Courtney Hines, Delaware Cty Board of DD, Jennifer Corcoran Changing Spaces Ohio, Matthew Helton, Changing Spaces Ohio, Chase Waits, DCBDD, Lane Beougher, OFCC and Kurt Beres, MA Design; Virtual: Christopher Parmelee, Jarrod Clay, Robert Glass, Joseph R. Briscar, Todd Hager, Duane Matlack, Troy Warnock, Jeremy M. Williams, Tim Thompson, Steve Risser and Brady Campbell.

### 10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

Summaries of written comments received with Board action on the comments and stakeholder meeting discussion in response to the March 2, 2023 proposed code update announcement are attached as Exhibit B.

### 11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

The proposed rules are based on the 2021 International Plumbing Code (IBC) promulgated and amended by the International Code Council (ICC). The model codes developed by ICC are updated every three years through a process that incorporates petitioning, public hearings and voting by ICC members. The ICC Committees that oversaw the development of the different provisions 2021 IPC included code officials, engineers, contractors and other professional organizations.

When a petition to amend the model code is submitted, the proponent of the change must submit the proposed language of the amendment, the reason for the amendment including

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scientific data when applicable, and the cost impact of the amendment. All submitted petitions are then published prior to initial code development hearings on the petitions. Interested persons may review the proposed changes and attend the code development hearing and provide comments. A report then is published on the public hearings for review and then final action is taken on the proposed changes at final action hearings. All successful changes are incorporated into the next edition of the model code.

Upon publication the Board's code committee reviews each substantive change included in the newest edition of the code and determines whether to recommend the change to the Board for adoption. The Board last fully updated the OPC on November 1, 2017.

12. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives? Alternative regulations may include performance-based regulations, which define the required outcome, but do not dictate the process the regulated stakeholders must use to comply.

See question 11.

13. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

Editorial changes are routinely made to the rules to provide consistency with the Ohio Revised Code and other Board and agencies' rules. Additionally, RC § 3781.10 gives the Board sole authority to adopt rules which regulate the erection, construction, repair, alteration, and maintenance of all buildings or classes of buildings specified RC 3781.06 including residential and non-residential buildings.

14. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

For these rules to be enforced by a local government, its building department must be certified by the Board. The Board also certifies the personnel who work within these departments to ensure only qualified personnel are enforcing the Board's rules. Certified personnel must complete continuing education to maintain their certifications and continue to be authorized to enforce these rules. The Board has authority to suspend or revoke certifications for failure to properly enforce the rules. Also, the Board has two staff members dedicated to responding to complaints by persons affected by the Board rules. This program helps promote consistent and predictable application of the Board rules.

#### **Adverse Impact to Business**

15. Provide a summary of the estimated cost of compliance with the rule(s). Specifically, please do the following:

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- a. Identify the scope of the impacted business community, and
  - Building owners
  - Design Professionals
  - Contractors
  - Building Department Personnel
- b. Quantify and identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance, etc.).

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a representative business. Please include the source for your information/estimated impact.

- Obtaining updated rules as published as the Ohio Plumbing Code
- Becoming familiar with the changes through research and training
- Increased cost of construction due to changes that require different construction methods/materials/products or increased stringency of construction standards.

Due to the variance in allowed building designs, it is difficult to ascertain, in dollars, a cost increase/decrease in the design cost of a building as a result of the proposed code update. However, as discussed in Question 11 above, when a code change proponent submits a petition to ICC to amend the model code an estimated cost impact of the proposal is included. Of the significant changes, the following sections included in the proposed rules were noted by the proponent as having a cost increase in construction:

606.1 Location of full-open valves - adds location 2.1 which requires separate water supply valve each tenant in a multiple tenant building

609.2.1 Tracer wire for nonmetallic piping - adds a requirement for a tracer wire for nonmetallic piping

16. Are there any proposed changes to the rules that will <u>reduce</u> a regulatory burden imposed on the business community? Please identify. (Reductions in regulatory burden may include streamlining reporting processes, simplifying rules to improve readability, eliminating requirements, reducing compliance time or fees, or other related factors).

The proposed rules now incorporate unchanged model code by reference rather than duplicating the language in the administrative code reducing total number of words codified by approximately: 90% from the Ohio Building Code; 85% from the Ohio Mechanical Code; and 75% from the Ohio Plumbing Code. Additionally, the proposed rules eliminates about 10,000 regulatory restrictions from the current Ohio Building Code as defined by RC 121.95, about 2,500 regulatory restrictions from the current Ohio Mechanical Code, and about 1,800 regulatory restrictions from the current Ohio Plumbing Code as defined in RC 121.95.

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Due to the variance in allowed building designs, it is difficult to ascertain, in dollars, a cost increase/decrease in the design cost of a building as a result of the proposed code update. However, as discussed in Question 11 above, when a code change proponent submits a petition to ICC to amend the model code an estimated cost impact of the proposal is included. Of the significant changes, the following sections included in the proposed rules were noted by the proponent as having a cost *decrease* in construction:

- 403.1.1 Fixture calculations adds exceptions 2 and 3 which provide design flexibility by allowing multi-user all-inclusive facilities and allowing single user toilet and bathing room fixtures to count toward the total number of required fixtures
- 403.1.2 Single-user toilet and bathing room fixtures allows single user toilets and bathing room fixtures to count toward the required number of total fixtures
- 403.2 Separate facilities adds exceptions 5 and 6 which provide design flexibility by allowing multiuser all-inclusive facilities and allowing single user toilet and bathing room fixtures to count toward the total number of required fixtures (not adopted in Ohio for use in E occupancies)
- 403.3.3 Location of toilet facilities in occupancies other than malls new exception intended to address self-storage Group S occupancies
- 403.6 Service sink location new section which allows service sinks to be within 300 ft of a tenant space
- 407.2 Bathtub waste outlets and overflows makes tub overflows optional because not all tubs have an overflow option
- 606.6 Water supply system test deletes section 606.7 requiring labeling of water distribution piping and direction of flow
- 607.1.1 Temperature limiting means allows the water heater to control the temperature when the water heater complies with ASSE 1082 or 1085
- 607.1.2 Tempered water temperature control breaks out the paragraph into a list and allows the water heater to control the temperature when the water heater complies with ASSE 1082 or 1085
- 1002.4.1 Trap seal protection adds a new section allowing a fixture drain to prime a floor drain
- 1002.4.1.5 Fixture drain connection for trap priming adds a new section allowing a fixture drain to prime a floor drain
- 1102.6 Roof drains adds a new ASPE/IAPMO standard for roof drains

### 17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The majority of the provisions noted above as having an increased cost impact enhance life safety and/or accessibility provisions of the code. Additionally, other changes included in the rule package will decrease cost of construction, offer regulatory alternatives, and recognize new technologies and materials.

#### **Regulatory Flexibility**

#### 18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

The rules do not have special exemptions or alternative means of compliance specifically for small business. The OBC requires a building official to issue an adjudication order to an owner when the design or construction of a building does not comply with the OBC. The adjudication order must comply with Revised Code Chapter 119 and give the owner an opportunity to appeal. This mechanism is often utilized by an owner voluntarily to obtain a variance from the requirements. Variance requests are heard by either the Ohio Board of Building Appeals or a certified local board of building appeals.

Also, the OBC permits alternative engineered designs prepared by a registered design professional to not strictly comply with the prescriptive requirements of the rules. To obtain approvals based on alternative engineered designs, the design professional must submit sufficient technical information to demonstrate that the performance meets the intent of the rules.

## 19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

Revised Code § 3781.102 does not authorize the Board to set the fees and/or penalties assessed by local certified building departments in connection with the enforcement of these rules. Compliance with the rules is accomplished through construction conforming to the certificate of plan approval (permit). Therefore, there are no potential paperwork violations of these rules.

#### 20. What resources are available to assist small businesses with compliance of the regulation?

As these proposed rules updates the Ohio Building Code to a new model code edition, the Board offers training and resources to building department personnel to prepare them to enforce the new codes. These resources are paid for by assessment fees collected by certified building departments pursuant to RC 3781.102 on behalf of the Board to be used exclusively

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for (1) the operating costs of the Board, (2) providing services, including educational programs, for building departments certified by the Board, and (3) paying the expenses of the Residential Construction Advisory Committee.

Additionally, the Board's technical staff spends approximately 25% of their time responding to questions on the building codes and educating design professionals, contractors, the public, and code officials of the intent of the Board's rules assisting all parties in compliance.

#### Exhibit A

| Ohio Administrative<br>Code Rule Number | 2024 OPC Section                  | Source of change<br>(2018 IPC, 2021<br>IPC, or BBS) | Description of Change   |
|---|-----------------------------------|---|---|
| 4101:3-1-01                             | 101.1                             | BBS   | Formal adoption by reference of the                                     |
|   |                                   |   | International Plumbing Code (IPC)                                       |
|   | 101.1.1                           | BBS   | "Rules of construction" are universal edits of the IPC                  |
|   | 101.3.1                           | BBS   | Identifies provisions of the plumbing                                   |
|   |                                   |   | code that are enforced by building                                      |
|   |                                   |   | official – Consolidated from multiple                                   |
|   |                                   |   | sections of the OPC   |
|   | 101.3.2                           | BBS   | Identifies who enforces medical gas                                     |
| 4101:3-2-01                             | Accessible                        | 2018  | Added definition  |
|   | Building                          | BBS   | Replaced definition   |
|   | Copper Alloy                      | 2021  | Added definition  |
|   | Existing installation             | BBS   | Replaced definition   |
|   | Full Open Valve                   | 2018  | Added definition  |
|   | Private                           | 2021 and BBS  | ICC Modified definition and   |
|   |                                   |   | BBS replaced definition   |
|   | Private residential swimming pool | BBS   | Added definition  |
|   | Press Connect Joint               | 2018  | Added definition  |
|   | Public or                         | 2021 and BBS  | ICC Modified definition and   |
|   | Public Utilization                |   | BBS replaced definition   |
|   | Public Swimming Pool              | 2018 and BBS  | ICC Added definition and  |
|   |                                   |   | BBS replaced definition   |
|   | Push-fit fitting                  | 2021  | Added definition  |
|   | Registered design                 | BBS   | Modified definition – includes landscape                                |
|   | professional                      |   | architects  |
|   | Swimming Pool                     | 2018 and BBS  | ICC Modified definition and   |
|   |                                   |   | BBS further modified  |
|   | Water Dispenser                   | 2021 and BBS  | ICC Modified definition and   |
|   |                                   |   | BBS retained current definition   |
| 4101:3-3-01                             | 301.3                             | BBS   | Kept ICC model code in charging   |
|   |                                   |   | paragraph. Kept Ohio modifications to                                   |
|   |                                   |   | exception #1 and relocated Ohio   |
|   |                                   |   | exception #2 to OPC Section 802.1.8                                     |
|   | 303.5                             | 2018 and BBS  | ICC Added - Third-party listing of soil                                 |
|   |                                   |   | pipe and BBS modified with Ohio terms                                   |
|   | 305.1                             | 2018  | Clarified - Corrosion protection of                                     |
|   |                                   |   | metallic pipe   |
|   | 305.3                             | BBS   | Modified section with petitioner language for pipes through foundations |
|   | 305.6                             | 2018  | Modified - Protection against physical                                  |
|   |                                   | 2010  | damage  |
|   | 307.7                             | BBS   | Relocated provision to OPC chapter 1                                    |
|   | 308.6                             | 2018  | Clarified - Sway bracing for drainpipes                                 |
|   | 308.9                             | 2021  | Modified - Bundled hot water piping                                     |
|   |                                   |   | insulation  |

|             | 308.10      | 2018 | Added - Thermal expansion tank              |
|-------------|-------------|------|---|
|             |             |      | support                                     |
|             | 309.1       | BBS  | Kept IPC model code – No modifications      |
|             | 309.3       | BBS  | Kept IPC model code – No modifications      |
|             | 310.3       | BBS  | Relocated provision to OPC chapter 1        |
|             | 312         | BBS  | Most of the Ohio changes to the testing     |
|             |             |      | and inspections section have remained       |
|             |             |      | with the exception of sections 312.10.1,    |
|             |             |      | 10.2, 312.11 and 312.12 (see below)         |
|             | 312.10.1    | BBS  | Kept IPC model code – No modifications      |
|             | 312.10.2    | BBS  | Kept IPC model code – No modifications      |
|             | 312.11      | BBS  | Delete unique Ohio section – Important      |
|             |             |      | for owners but not within the OPC scope     |
|             | 312.12      | BBS  | Delete unique Ohio section –                |
|             |             |      | Duplication of chapter 1 requirements.      |
|             | 314.2.3.3   | 2021 | Added – identification of concealed         |
|             |             |      | condensate piping as primary or             |
|             |             |      | secondary                                   |
|             | 314.3       | BBS  | Relocated provision to OPC chapter 1        |
|             | 317         | BBS  | Replace entire section with general         |
|             |             |      | reference directing owners to comply        |
|             |             |      | with DIC rules for submission (RC           |
|             |             |      | §4104.44)                                   |
|             |             |      | 3.25,                                       |
| 4101:3-4-01 | Table 403.1 | 2018 | Modified - Added fixtures for a gaming      |
|             |             |      | area  |
|             |             |      | Modified - Deleted Group classification     |
|             |             |      | column                                      |
|             |             |      | Modified - Added Note f for swimming        |
|             |             |      | pool fixture quantities.                    |
|             |             | BBS  | Kept model code values and column           |
|             |             |      | headings – Ohio modifications moved         |
|             |             |      | footnote f from "outdoor sporting           |
|             |             |      | events and activities" description cell to  |
|             |             |      | "assembly" classification cell as well as   |
|             |             |      | deleted current Ohio footnotes f and g      |
|             |             |      | as redundant with Sections 403.3 and        |
|             |             |      | 424.2                                       |
|             | 403.1.1     | 2021 | Modified – Added 2 exceptions to            |
|             |             |      | address fixture contribution from multi-    |
|             |             |      | user and single-user facilities serving all |
|             |             |      | genders to the overall count required by    |
|             |             |      | Table 403.1                                 |
|             |             | 2018 | Modified - Signage for single user toilet   |
|             |             |      | room  |
|             | 403.1.2     | 2021 | Clarified – Fixture count contribution      |
|             |             |      | from single user toilet rooms               |
|             | 403.1.3     | 2018 | Added - Lavatories distribution             |
|             | 703.1.3     | 2010 | proportionate to water closets              |
| 1           |             |      | proportionate to water closets              |

| 403.2   | 2018 | Modified – Added small business             |
|---------|------|---|
| 403.2   | 2018 |   |
|         | 2021 | exception                                   |
|         | 2021 | Modified – Added multi-user, multi-         |
|         | DDC  | gender toilet room design exceptions        |
|         | BBS  | Modified – Added Group E limitation for     |
| 100.0   | 2010 | separate facilities                         |
| 403.3   | 2018 | Clarified - Public/Employee toilet facility |
|         |      | simplification                              |
|         | BBS  | Modified – Removed attendant                |
|         |      | condition. All parking garages are          |
|         |      | exempt                                      |
| 403.3.1 | 2021 | Clarified – Remove accessible route         |
|         |      | duplication                                 |
| 403.3.3 | 2021 | Modified – Added exception for distance     |
|         |      | to toilet in Group S                        |
| 403.5   | 2021 | Clarified – Remove accessible route         |
|         |      | duplication                                 |
| 403.6   | 2021 | Added – Service sink location limits        |
| 403.7   | BBS  | Relocated provision to OPC chapter 1        |
| 404.3   | BBS  | Relocated provision to OPC chapter 1        |
| 405.3.1 | 2018 | Clarified - Clearance to obstruction        |
| 405.3.4 | BBS  | Modified – Added requirement for            |
|         |      | water closet compartment in multi-user,     |
|         |      | all gender toilet rooms                     |
| 405.3.5 | 2018 | Clarified – Minimum distance between        |
|         |      | urinal partitions                           |
| 405.4.3 | 2021 | Modification – Added new standard for       |
|         |      | water closet carriers                       |
| 405.5   | 2018 | Added – Standard for pumped waste           |
|         |      | fixtures                                    |
| 407.2   | 2021 | Modified – Bathtub overflow optional        |
| 409.1   | 2018 | Modified – Added standard for               |
|         |      | residential dishwashing machines NSF        |
|         |      | 184   |
| 409.4   | 2018 | Modified – Waste connection                 |
|         |      | requirement for residential dishwasher      |
|         |      | relocated from 802.1.6 and language         |
|         |      | revised for clarity                         |
| 410.3.2 | 2021 | Added – Quantity of drinking fountains      |
|         |      | used while standing v. while seated         |
| 410.4   | 2021 | Clarified – Minimum required before         |
|         |      | substitution of dispensers for fountains    |
|         | BBS  | Retained Ohio language for water            |
|         |      | dispenser substitution of drinking          |
|         |      | fountains                                   |
| 411.3   | 2018 | Added – Temperature mixing for              |
|         |      | emergency shower/eyewash                    |
|         | 2021 | Modified – Control of temperature           |
|         |      | where shower/eyewash has direct             |
|         |      | supply from water heater                    |
| 1       | 1    | 1- 1- 1                                     |

|             | 412     | 2018 | Relocated section 424 to 412             |
|-------------|---------|------|--|
|             | 412.3   | 2021 | Modified – Lower flow shower heads       |
|             | 412.4   |      | must be compatible with mixing valve     |
|             | 412.5   | 2021 | Modified – Added methods of              |
|             |         |      | temperature limiting control for         |
|             |         |      | bathtubs                                 |
|             | 412.7   | 2018 | Added – Flow limiting device as part of  |
|             |         |      | temperature limiting control. Not a      |
|             |         |      | substitute for temperature limiting      |
|             |         |      | valves per 412.3 and 412.5               |
|             | 412.10  | 2021 | Modified – Added methods for             |
|             |         |      | temperature limiting control for head    |
|             |         |      | shampoo sinks.                           |
|             | 412.11  | 2021 | Added – New text and standard for pre-   |
|             |         |      | rinse spray valves used in commercial    |
|             |         |      | food prep                                |
|             | 414     | 2018 | Relocated section 427 to 414             |
|             | 415     | 2018 | Relocated section 425 to 415             |
|             | 416     | 2018 | Relocated section 413 to 416             |
|             | 416.1   | 2021 | Modified – New standard for              |
|             |         |      | commercial food waste disposers          |
|             | 417     | 2018 | Relocated section 414 to 417             |
|             | 418     | 2018 | Relocated section 415 to 418             |
|             | 419     | 2018 | Relocated section 416 to 419             |
|             | 419.1   | 2021 | Modified – Clarified impact on fixture   |
|             |         |      | count where a group wash fixture is      |
|             |         |      | used.                                    |
|             | 419.3   | 2021 | Modified – Included group wash fixtures  |
|             |         |      | for minimum waste outlet size.           |
|             | 419.5   | 2021 | Modified – Deleted CSA B125.3 standard   |
|             |         |      | as acceptable temperature limiting       |
|             |         |      | device for public handwashing – part of  |
|             |         |      | ASSE 1070                                |
|             | 420     | 2018 | Relocated section 426 to 420             |
|             | 421     | 2018 | Relocated section 417 to 421             |
|             | 421.1   | 2021 | Modified – Added new standards for       |
|             |         |      | different types of prefab showers        |
|             | 421.3.1 | 2021 | Added – Standard for waste fittings that |
|             | 165     |      | drain a shower.                          |
|             | 422     | 2018 | Deleted entire section for health care   |
|             |         |      | fixtures and equipment. Relocated        |
|             | 122.5   | 2001 | section 418 to 422                       |
|             | 423.3   | 2021 | Modified – Replaced CSA standard with    |
|             |         |      | ASSE 1082 standard for footbaths and     |
|             | 434     |      | pedicure baths                           |
|             | 424     |      | Relocated section 419 to 424             |
|             | 425     |      | Relocated section 420 to 425             |
| 4404.0.7.01 | 426     | 2006 | Relocated section 421 to 426             |
| 4101:3-5-01 | 501.2   | 2021 | Clarified – Align code language with     |
|             |         |      | language of standard                     |

|             | 502.1    | 2018        | Modified – Added solar thermal water                                  |
|-------------|----------|-------------|---|
|             | 502.1    | 2010        |   |
|             |          |             | heating systems and compliance with                                   |
|             | 502.4.4  | DDC .       | mechanical code and ICC 900 standard.                                 |
|             | 502.1.1  | BBS         | Deleted Ohio exception. This is part of                               |
|             | 504.6    | 2010        | the listing   |
|             | 504.6    | 2018        | Modified – T & P discharge piping                                     |
|             |          |             | minimum size where insert fitting are                                 |
|             |          |             | used.   |
|             | 504.7    | 2018        | Modified – Expanded the types of materials for water heater drain pan |
| 4101:3-6-01 | 602.3    | BBS         | Delete all of section 602.3. This work is                             |
|             |          |             | regulated through ODH rules for private                               |
|             |          |             | water supply.   |
|             | 602.3.1  | 2018        | Modified – Added standard for water                                   |
|             |          |             | well construction that is not otherwise                               |
|             |          |             | regulated. This change is moot.                                       |
|             | 602.3.5  | 2021        | Modified – Added NSF standard for                                     |
|             | 00000    |             | potable water pumps. This change is                                   |
|             |          |             | moot.   |
|             | 603.3    | BBS         | Relocated provision to OPC chapter 1                                  |
|             | 605.2    | 555         | Returned to model code organization of                                |
|             | 003.2    |             | section. Separate requirements for                                    |
|             |          |             | water supply in general from  |
|             |          | 605.2.1 BBS | requirements for drinking water supply                                |
|             |          |             | specifically.   |
|             | 605.2.1  |             | Relocated unique Ohio exceptions to                                   |
|             | 003.2.1  |             | 605.2.1 (which was previously deleted)                                |
|             | 605.11   | 2018        | Deleted Section 605.11 Brass. Brass is                                |
|             | 003.11   |             | one type of copper alloy. Subsequent                                  |
|             |          |             | sections renumbered   |
|             | 605.12.3 |             | Modified – Solder and flux used in                                    |
|             | 003.12.3 | 2021        | drinking water systems must comply                                    |
|             | 605.13.6 |             | with NSF 61 standard  |
|             | 605.13.7 |             | Clarified – where push-fit type joints are                            |
|             | 605.14.4 | 2018        | acceptable  |
|             | 605.16.3 |             | acceptable  |
|             | 606.1    | 2021        | Modified – Added location #2.1 for                                    |
|             |          |             | water shut-off at each tenant in multi-                               |
|             |          |             | tenant buildings other than a dwelling                                |
|             |          | BBS         | Retains Ohio modification for location                                |
|             |          |             | #4 at the base of every water riser.                                  |
|             | 606.7    | 2021        | Deleted the labeling of water   |
|             |          |             | distribution pipes where bundled.                                     |
|             | 607.1.1  |             | Modified - Expands means and  |
|             |          | 2021        | standards for temperature limiting and                                |
|             | 607.1.2  | 2021        | tempered water control. Revised the                                   |
|             |          |             | format of 607.1.2.  |
|             | 607.3    | 2018        | Modified – Allows other means of                                      |
|             |          |             | pressure control in a hot water system                                |
|             |          |             | beyond a thermal expansion tank only                                  |
| <b>.</b>    | ,        | ,           | •   |

|             | 608.3                    | _              | Modification – Added 608.4 and            |
|-------------|--------------------------|----------------|---|
|             | เ ทบช.4                  |                |   |
|             | 333                      | 2010           | extracted requirement from 608.3 to       |
| ļ           |                          | 2018           | clarify backflow protection. All          |
|             |                          |                | subsequent subsections are                |
| ļ           |                          |                | renumbered                                |
|             | 608.12                   | 2018           | Modified – Renumbered and added           |
|             | (formerly 608.11)        |                | compliance with NSF 61 standard for       |
| ļ           |                          |                | interior of tanks in contact with potable |
| !           |                          |                | water.                                    |
|             | 608.15.2.1               | 2021           | Modified – Drainage for backflow          |
| ļ           | (formerly 608.14.2.1)    |                | preventer discharge must accommodate      |
| ļ           | (101111611) 000.1 1.2.1) |                | max flow rate per manufacturer specs      |
|             | 608.17.1                 | 2018           | Modified – Renumbered and                 |
| ļ           |                          | 2010           |   |
|             | (formerly 608.16.1)      |                | reorganized sections to clarify backflow  |
|             | 608.17.1.1               |                | requirements used with carbonated         |
|             |                          |                | beverage machines from requirements       |
|             | 608.17.1.2               |                | used with coffee and non-carbonated       |
|             |                          |                | beverage machines (formerly 608.16.10)    |
|             | 608.17.2                 | 2021           | Modified – Added ASSE 1081 standard       |
|             | (formerly 608.16.2)      |                | for backflow requirements used with       |
|             |                          |                | low hazard boiler                         |
|             | 608.17.10                | 2018           | Added – Backflow protection               |
|             |                          |                | requirements for humidifiers              |
|             | 609.1                    | 2018           | Modified – Replaced outdated care         |
|             | 003.1                    | 2010           | facility terminology with current terms   |
| ļ           | 609.2                    | 2021           | Modified – Replaced terminology and       |
| !           | 609.2                    | 2021           | •   |
| !           |                          |                | expanded on requirements for a            |
| ļ           |                          |                | redundant water service Grp I-2, Cond 2   |
| ļ           | 609.2.1                  | 2021           | Added – Requirement for tracer wire on    |
| ļ           |                          |                | water service for Group I-2, Cond 2       |
| ļ           | 610.1                    | BBS & Petition | Added – Exception that outlines           |
| ļ           |                          | #23-01         | disinfection process for safe potable     |
|             |                          |                | water in new plumbing systems of          |
|             |                          |                | dwellings                                 |
|             | 611.1                    | 2018           | Modified – Added NSF standard for         |
|             |                          |                | reverse osmosis treatment unit.           |
| 4101:3-7-01 | 701.2                    | 2018           | Modified – Connection to sewer            |
| .101.0 / 01 | , 02.2                   | 2010           | required except for gray water systems    |
|             |                          |                | (ODH rules)                               |
|             |                          | DDC            |   |
|             |                          | BBS            | Modifies model code to simplify. Public   |
|             |                          |                | sewer or as otherwise permitted by        |
|             |                          | 2015           | OEPA or ODH.                              |
|             | 701.8                    | 2018           | Deleted – sanitary drainage above "food   |
|             |                          |                | areas" no longer prohibited.              |
|             |                          | BBS            | Added – new section 701.8 for reuse of    |
|             |                          |                | existing sanitary drain piping            |
| !           |                          |                | A4 1:0: 1 0: 1 1 11 10 DD :               |
| 1           | 702.3                    | 2018           | Modified – Standard added for PP pipe     |

|             |                | BBS  | Ohio continues to delete this section and Table 702.3 as outside the scope of                               |
|-------------|----------------|------|---|
|             |                |      | the OPC   |
|             | 703            | BBS  | Ohio continues to delete this section in  |
|             |                |      | its entirety as outside the scope of the  |
|             |                |      | OPC   |
|             | 703.4          | 2018 | Modified – Use of existing building drain   |
|             |                |      | is clarified. Change is moot.   |
|             | 704.1          | 2018 | Modified – Slope for grease laden waste minimum ¼ inch/foot (2%)  |
|             | 704.2          | 2018 | Modified – Allowable reduction in pipe  |
|             |                |      | size clarified and expanded   |
|             | 705.2.4        | 2021 | Added – Push-fit DWV fittings for ABS   |
|             | 705.10.4       |      | and PVC piping  |
|             | 705.16.4       | 2018 | Modified – Allows a solvent cement joint between drain and sewer where only one joint is needed between ABS |
|             |                |      | and PVC.  |
|             | 706.3          | BBS  | Added language for through wall   |
|             |                |      | drainage in response to a petition  |
|             | 708.1.6        | 2021 | Added – Removeable fixture traps are  |
|             |                |      | acceptable as cleanouts. Subsequent   |
|             |                |      | subsections in 708.1 are renumbered   |
|             | 709.3          | 2018 | Clarified – Conversion of GPM to  |
|             |                |      | drainage fixture units (DFU)  |
|             | 712.3.2        | 2018 | Modified – Limits on elevation of some  |
|             |                |      | sump pit covers   |
|             | 712.4.2        | 2018 | Modified – Limit of waste ejector solids  |
|             |                |      | reduced to ½" max.  |
|             | 713            | 2018 | Deleted – All of health care plumbing is  |
|             |                |      | deleted as outdated or superseded.  |
|             |                | 2010 | Renumber subsequent Sections  |
|             | 716            | 2018 | Modified – Pipe bursting method for   |
|             | (formerly 717) | DDC  | replacement allowed for building drain  |
|             |                | BBS  | Retains model code but modifies for use   |
|             | 717            | 2021 | with building drain only (not sewer.)   |
|             | 717            | 2021 | Added – Relining method for restoring building sewers and drains  |
|             |                | BBS  | Modifies for use with building drain only   |
|             |                | 555  | (not sewer.) Deleted subsections (717.3,  |
|             |                |      | .3.1, .4, .5, .6, .8 and .10) are   |
|             |                |      | administrative or manufacturer's  |
|             |                |      | instruction content.  |
|             | 718            | 2021 | Added – Cure-in-place method for  |
|             |                |      | rehabilitation of building drain  |
|             |                | BBS  | Deleted this section in its entirety  |
| 4101:3-8-01 | 801.2          | 2018 | Modified – Added humidification   |
|             |                |      | equipment that discharges to a drain  |
|             |                |      | must be protected   |

|              | 802.1              | 2018             | Modified – Waste-water discharge from humidification equipment must be |
|--------------|--------------------|------------------|--|
|              |                    |                  | indirectly connected to sanitary drain                                 |
|              | 802.1.6            | 2018             | Deleted – Domestic dishwashing   |
|              |                    |                  | machines. Renumber subsequent sub                                      |
|              |                    |                  | sections.  |
|              | 802.1.7            | Petition #18-06  | Modified to allow direct connection for                                |
|              | (formerly 802.1.8) |                  | pot, pan and utensil sinks. Clarify that                               |
|              |                    |                  | food sinks are under 802.1.1   |
|              | 802.1.8            | BBS              | Relocated Ohio provision from  |
|              |                    |                  | exception #2 under OPC Section 301.3                                   |
|              | *802.4             | BBS – comment    | *Add an exception that allows  |
|              |                    | from Kyle Gordon | standpipes to have "access" rather than                                |
|              |                    | of Heapy Eng.    | "ready access"   |
|              | 802.4.3.1          | 2018             | Added – Alternative connection of                                      |
|              |                    |                  | laundry tub/tray, without a fixture trap,                              |
|              |                    |                  | to clothes washer standpipe  |
| 4101:3-9-01  | 903.1              | 2021             | Reorganized the section for clarity                                    |
|              | 903.1.3            | 2021             | Added – Requirements for vent  |
|              |                    |                  | terminations where covered by roof-                                    |
|              |                    |                  | mounted panel (e.g. solar or PV) or an                                 |
|              |                    |                  | architectural roof element (e.g.                                       |
|              |                    |                  | decorative shroud)   |
|              | 903.1.4            | 2021             | Relocated – Requirements for sidewall                                  |
|              | (formerly 903.6)   |                  | vent terminals.  |
|              | 915.1              | 2021             | Modified – Food waste disposer may                                     |
|              |                    |                  | discharge into a combination waste vent                                |
|              | 915.2              | Petition #18-05  | Retained model code for combination                                    |
|              |                    |                  | waste and vent, allowing vertical pipe                                 |
|              |                    |                  | between fixture drain of floor drain and                               |
|              |                    |                  | horizontal pipe  |
|              | 918.8              | 2018             | Modified – Limit use of AAV near air                                   |
|              |                    |                  | intakes  |
| 4101:3-10-01 | 1002.1             | 2021             | Modified – Deleted existing exception                                  |
|              |                    |                  | #3 and adds new exception #4 which                                     |
|              |                    |                  | will allow direct connection of pot and                                |
|              |                    |                  | pan sinks to a hydromechanical grease                                  |
|              |                    |                  | interceptor under certain conditions.                                  |
|              |                    |                  | Renumbered subsequent exception  |
|              |                    | BBS & Petition   | Modified – Retained model code in                                      |
|              |                    | #18-04           | Exception 1 and relocated distance to                                  |
|              |                    |                  | trap requirements in new subsections                                   |
|              | 1002.1.1           | BBS              | Added – Relocated requirements for                                     |
|              |                    |                  | vertical distance to trap weir with an                                 |
|              |                    |                  | exception  |
|              | 1002.1.2           | BBS              | Added – Relocated requirements for                                     |
|              | İ                  |                  | harizantal distance to tran inlet without                              |
|              |                    |                  | horizontal distance to trap inlet without                              |
|              |                    |                  | exception  |
|              | 1002.4.1.5         | 2021 & Petition  | •  |

|              | *1003.3.2  | 2018 | Modified – Prohibits a food waste       |
|--------------|------------|------|---|
|              |            |      | disposer from discharging into a grease |
|              |            |      | interceptor.                            |
|              |            | *BBS | *Retain model code                      |
|              | *1003.3.3  | 2018 | Added – Additives to grease interceptor |
|              |            |      | must comply with manufacturer's         |
|              |            |      | instructions and ASME A112.14.          |
|              |            |      | standard                                |
|              |            | *BBS | *Retain model code                      |
| 4101:3-11-01 | 1102.4     | 2018 | Modified – Added types of pipe allowed  |
|              |            |      | for use in storm sewer.                 |
|              |            | BBS  | Deleted section and table. Model code   |
|              |            |      | change is moot                          |
|              | 1102.6     | 2021 | Modified – Added testing and rating of  |
|              |            |      | roof drains in accordance with a        |
|              |            |      | standard                                |
|              | 1106.2.1   | 2021 | Added – Equation to convert rainfall    |
|              |            |      | rate to GPM                             |
|              | 1106.5     | 2018 | Modified – Sets a minimum size and      |
|              |            |      | location (elevation) of scuppers        |
| 4101:3-12-01 | 1202.1     | 2021 | Modified – Aligned the requirement      |
|              |            |      | with the NFPA 99 standard.              |
|              | 1202.2     | BBS  | Relocated enforcement provision to      |
|              |            |      | OPC Chapter 1.                          |
| 4101:3-13-01 | Chapter 13 | 2015 | Non-potable water systems – ODH rules   |
| 4101:3-14-01 | Chapter 14 | 2015 | Subsurface graywater soil absorption    |
| 4101:3-15-01 | 1501.3     | BBS  | Updated referenced standards:           |
|              |            |      | IAPMO Z124.10                           |
|              |            |      | ICC A117.1                              |
|              |            |      | NFPA 37                                 |
|              |            |      | NFPA 70                                 |

<sup>\*</sup>Indicates a change after the stakeholder comment period

#### **Exhibit B**

| 2024 Ohio Plumbing Code Comments |                  |              |   |                                |                       |
|----------------------------------|------------------|--------------|---|--------------------------------|-----------------------|
| Commenter                        | Email            | Code Section | Comment   | Staff Comments                 | Code Committee Action |
|                                  |                  |              | O.P.C. Combination waste & vent system section 915.1            |                                |                       |
|                                  |                  |              | propose Modified food waste disposer may discharge into a       |                                |                       |
|                                  |                  |              | combination waste and vent system. Since 1998 when Ohio         |                                |                       |
|                                  |                  |              | adopted this code the combination waste & vent system           |                                |                       |
|                                  |                  |              | been working great with no problems because the type of         |                                |                       |
|                                  |                  |              | plumbing fixtures allowed on the system all water discharge     |                                |                       |
|                                  |                  |              | plumbing fixtures allowing air over water in the drain sizing   |                                |                       |
|                                  |                  |              | chart. By allowing a garbage disposer on the                    |                                |                       |
|                                  |                  |              | Combination waste and vent system the solids from the           | American Society of Plumbing   |                       |
|                                  |                  |              | disposal will take up more of the pipe inside volume less air   | Engineers (ASPE) researched    |                       |
|                                  |                  |              | to vent the plumbing system . I think this will cause many      | this issue and demonstrated    |                       |
|                                  |                  |              | problems .  | that system works when food    |                       |
|                                  |                  |              |   | waste disposer discharges into |                       |
| Allen, Mark                      | mallen@phdmc.org | 915.1        |   | CW&V system                    | 3/30 No change        |
|                                  |                  |              |   |                                |                       |
|                                  |                  |              |   | Food particles could block the |                       |
|                                  |                  |              |   | flow of the small openings and |                       |
|                                  |                  |              | Modified – Prohibits a food waste disposer from discharging     | baffles within the             |                       |
|                                  |                  |              | to a grease interceptor. This is a big mistake the current 2018 | hydromechanical grease         |                       |
|                                  |                  |              | O.P.C. Section 1003.3.2 allowing the food waste disposal        | interceptor. Because of the    |                       |
|                                  |                  |              | connect   | small size of hydromechanical  |                       |
|                                  |                  |              | to the grease interceptor , a solid interceptor shall separate  | grease interceptors,           |                       |
|                                  |                  |              | the discharge before connecting to the grease interceptor.      | manufacturers of this type of  |                       |
|                                  |                  |              | This installation works great! In a commercial kitchen when     | interceptor state that food    |                       |
|                                  |                  |              | they scape all the plates off                                   | particles from a disposal      |                       |
|                                  |                  |              | into a food waste disposal before they enter the dish washer    | should not be discharged into  |                       |
|                                  |                  |              | this is where all the grease drains to. This section of code    | a hydromechanical              |                       |
| Allen, Mark                      | MAllen@phdmc.org | 1003.3.2     | should remain the same.   | interceptor.                   | 3/30 No change        |